

EXHIBIT 1

INDEX IN SUPPORT OF MOTION TO SEAL

Material		Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Declaration of Timothy Danaher (ECF No. 11) (Redacted version filed under ECF No. 12)						
Paragraph 11	Words and numbers between “sold” and “JUULPods; words and numbers between “over” and “marketing”	Plaintiff Juul Labs, Inc. (“Juul Labs”) requests sealing of the information because it reveals, contains, and/or reflects sensitive proprietary commercial and business information regarding Juul Labs’ marketing and development of the JUUL products. It also reflects sensitive financial, corporate accounting and business information of Juul Labs’ and its vendors. Further, this proprietary information is presently confidential and unavailable to the public. ¹	If filed on the public docket, the information will reveal confidential and proprietary information regarding Juul Labs’ marketing, development, and research activities and expenditures. It will also reveal confidential information regarding sensitive corporate accounting and business operations information. This information is regarded as highly proprietary and kept confidential, and is not otherwise disseminated to the public. As such, if this	There is no less restrictive alternative other than sealing the designated portions. Any alternative to sealing does not provide the protections required for such nonpublic proprietary and confidential information. ³	None	None

¹ This explanation of the “legitimate public or private interest warranting relief” is referred to herein as “Basis for Sealing.”

³ This explanation of “why a less restrictive alternative to the relief sought is not available” is referred to herein as “No Alternative.”

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		<i>See</i> Cooke Decl., ¶¶ 8-11.	request to seal is not granted, the disclosure of this information would provide the public insight into the business and operations of JLI, its processes in considering, researching, developing, and marketing its products, and would give competitors an unfair advantage in the highly competitive e-cigarette marketplace. ² <i>See</i> Cooke Decl. ¶ 10.			
Exhibit 1 to the Declaration of Timothy Danaher (ECF No. 11-1)(Redacted version filed under ECF No. 12-1)						
Exhibit 1	Entirety	<i>See</i> Basis for Sealing.	<i>See</i> Injury.	<i>See</i> No Alternative.	None	None
Declaration of Michael Walter (ECF No. 11-2) (Redacted version filed under ECF No. 12-2)						
Paragraph 30	Entirety	<i>See</i> Basis for Sealing.	<i>See</i> Injury.	<i>See</i> No Alternative.	None	None
Paragraph 31	Entirety	<i>See</i> Basis for Sealing.	<i>See</i> Injury.	<i>See</i> No Alternative.	None	None

² This explanation of the “clearly defined and serious injury that would result if the relief is not granted” is referred to herein as “Injury.”

Material		Legitimate Public or Private Interest Warranting Relief	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Exhibit 1 to the Declaration of Michael Walter (ECF No. 11-3) (Redacted version filed under ECF No. 12-3)						
Exhibit 1	Entirety	<i>See</i> Basis for Sealing.	<i>See</i> Injury.	<i>See</i> No Alternative.	None	None
Exhibit 1 to the Declaration of Michael Walter (ECF No. 11-4) (Redacted version filed under ECF No. 12-4)						
Exhibit 2	Entirety	<i>See</i> Basis for Sealing.	<i>See</i> Injury.	<i>See</i> No Alternative.	None	None